

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

SCOTT HILDRETH, #2007-0028801, )  
Plaintiff, )  
v. ) Civil Action No. 08-cv-03506  
COOK COUNTY, ) Judge Rubén Castillo  
SHERIFF OF COOK COUNTY, and ) Magistrate Judge Brown  
EXECUTIVE DIRECTOR SALVADOR GODINEZ, )  
Defendants. ) (Jury Demanded)

## AMENDED COMPLAINT

Plaintiff, by counsel, alleges as follows:

1. This is a civil action arising under the Americans with Disabilities Act (ADA), 42 U.S.C. § 1983 and 42 U.S.C. § 12101, *et. seq.* The jurisdiction of this Court is conferred by 28 U.S.C. §§ 1331 and 1343.
2. Plaintiff, Scott Hildreth, is a prisoner presently incarcerated at the Cook County Department of Corrections, P.O. Box 089002, Chicago, Illinois 60608.
3. Defendants are Cook County, the Sheriff of Cook County, and Executive Director Godinez of the Cook County Department of Corrections.

4. Plaintiff suffers from Parkinson's disease and is disabled.
5. Due to complications from his disability resulting from the Parkinson's disease, Plaintiff is no longer able to write in a legible manner.
6. Plaintiff's inability to legibly write has caused him to no longer to be able to effectively communicate with his attorneys, the courts, employees and administrators within his correctional facility, and his family,
7. Plaintiff has been and continues to be discriminated against because of his disability in violation of Title 2 of the ADA because defendants have refused to provide appropriate accommodations for the Plaintiff so that he can effectively create written communications.
8. As a result of the foregoing, Plaintiff has suffered injuries, has been subjected to emotional distress, and has been deprived of equal protection of law, as secured by the Fourteenth Amendment to the Constitution of the United States, and has been discriminated against in violation of the ADA.
9. Plaintiff hereby demands trial by jury.

WHEREFORE, Plaintiff respectfully requests an entry of judgment from this Court:

- A) Ordering Defendants to provide Plaintiff an appropriate accommodation for his disability, *e.g.*, access to a typewriter or word processor, so that he can produce written communications;
- B) Awarding Plaintiff adequate monetary damages to compensate him for the injuries that he has suffered; and
- C) Awarding Plaintiff any additional relief that the Court determines to be appropriate.

Respectfully submitted,

s/ Steven R. Pedersen  
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*Attorney for Plaintiff*

Dated: September 22, 2008

**DEMAND FOR JURY TRIAL**

Pursuant to Fed. R. Civ. P. 38(b), Plaintiff demands a jury trial of all issues properly triable to a jury in this case.

Respectfully submitted,

s/ Steven R. Pedersen  
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*Attorney for Plaintiff*

Dated: September 22, 2008